

1 TOWNSEND AND TOWNSEND AND CREW LLP
 2 DAVID E. SIPIORA (State Bar No. 124951)
desipiora@townsend.com
 3 KRISTOPHER L. REED (State Bar No. 235518)
klreed@townsend.com
 4 1200 Seventeenth Street, Suite 2700 Denver, CO 80202
 Telephone: (303) 571-4000
 5 Fax: (303) 571-4321

6 Attorneys for Plaintiff
 7 PULSE ENGINEERING, INC.

8 MARTIN J. O'DONNELL, ESQ. (BBO No. 377745)
mod@c-m.com
 9 CESARI AND MCKENNA LLP
 10 88 Black Falcon Avenue
 Boston, MA 02210
 11 TEL: 617.951.2500
 FAX: 617.951.3927

12 THOMAS W. FERRELL, ESQ. (Bar No. 115605)
tferrell@higslaw.com
 13 HIGGS, FLETCHER & MACK LLP
 14 401 West "A" Street, Suite 2600
 San Diego, CA 92101-7913
 15 TEL: 619.236.1551
 FAX: 619.696.1410

16 Attorneys for Defendant
 17 MASCON, INC.

18
UNITED STATES DISTRICT COURT

19
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

20
 21 PULSE ENGINEERING, INC., a Delaware
 corporation,

Case No. 08cv0595 JM AJB

22 Plaintiff,

**JOINT MOTION FOR ENTRY OF
 23 PROTECTIVE ORDER**

v.

24
 25 MASCON, INC., doing business as ATW
 SECURITY, a Massachusetts corporation,

26
 27 Defendant.

1 Plaintiff Pulse Engineering, Inc. and Defendant Mascon, Inc., by and through their respective
2 attorneys, hereby respectfully request that the Court enter the parties' proposed Stipulated Protective
3 Order.

4 Pursuant to Section 2(h) of the Electronic Case Filing Administrative Policies and Procedures
5 Manual, the proposed Stipulated Protective Order has been submitted to the chambers of Judge
6 Anthony J. Battaglia by e-mail to *efile_battaglia@casd.uscourts.gov*.

7
8 DATED: August 18, 2008

TOWNSEND AND TOWNSEND AND CREW LLP

9 **s/ Kristopher L. Reed**

10 David E. Sipiora
11 Kristopher L. Reed
12 Attorneys for Plaintiff Pulse Engineering, Inc.
13 Email: desipiora@townsend.com
14 Email: klreed@townsend.com

15 CESARI AND MCKENNA LLP

16 **s/ Martin J. O'Donnell**

17 Martin J. O'Donnell
18 Attorney for Defendant Mascon, Inc.
19 Email: mod@c-m.com

CERTIFICATE OF SERVICE

This is to certify that a copy of **JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER** was served on the following parties by CM/ECF:

Martin J. O'Donnell
Cesari and McKenna LLP
88 Black Falcon Avenue
Boston, MA 02210

Thomas W. Ferrell
Higgs, Fletcher & Mack LLP
401 West "A" Street
Suite 2600
San Diego, CA 92101

Nelson P. Lovins
Lovins & Metcalf
10 Cedar Street
Woburn, MA 01801

Attorneys for Defendant.

Dated: August 18, 2008

s/ Kristopher L. Reed